

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELLE LALLI,

Plaintiff,

-v-

WARNER BROS. DISCOVERY, INC.;
WARNER MEDIA, LLC U.S. SEVERANCE
PLAN,

Defendants.

Civil Action No. 1:24-cv-03178-LJL

PROPOSED ORDER

THIS MATTER having been opened to the Court by Littler Mendelson, P.C., attorneys for Defendants Warner Bros. Discovery, Inc. and Warner Media, LLC U.S. Severance Plan (“Defendants”), for an Order pursuant to Fed. R. Civ. P. 57 and 28 U.S.C. § 2201 for a declaratory judgment; and the Court having considered the submissions in support thereof and in opposition to the requested relief, and for good cause shown,

IT IS on this ____ day of _____, 2024,

ORDERED that Defendants’ Motion for Declaratory Judgment is hereby granted in its entirety; and it is further

ORDERED that if Plaintiff prevails on her ERISA claim she must sign a release of all claims and all other claims in her Amended Complaint must be dismissed.

Hon. Lewis J. Liman, U.S.D.J.